

**IN THE COURT OF COMMON PLEAS  
RICHLAND COUNTY, OHIO  
CIVIL DIVISION**

RICHLAND COUNTY  
CLERK OF COURTS  
FILED

2021 FEB -4 P 2:26

LINDA H. FRARY  
CLERK OF COURTS

ERNESTINE R. WILLIAMS, Individually and as :  
Administrator of the Estate of Skylar Williams :  
1574 Windsor Road :  
Mansfield, Ohio 44905 :

Plaintiff,

v.

CLERAC, LLC d/b/a :  
ENTERPRISE RENT-A-CAR :  
c/o Statutory Agent :  
CT Corporation System :  
4400 Easton Commons Way :  
Suite 125 :  
Columbus, Ohio 43219 :

and

EAN HOLDINGS, LLC d/b/a :  
ENTERPRISE RENT-A-CAR :  
c/o Statutory Agent :  
CT Corporation System :  
4400 Easton Commons Way :  
Suite 125 :  
Columbus, Ohio 43219 :

and

ENTERPRISE HOLDINGS INC. :  
General Manger or Counsel :  
600 Corporate Park Drive :  
St. Louis, MO 63105 :

and

JOHN DOE (s), Any Individuals, Corporations :  
Limited Liability Companies, Businesses, or Other :  
Entities: Names and addresses Unknown, :

Defendants.

CASE NO.: 21 CV 661  
JUDGE: NAUMOFF

Magistrate Judge: \_\_\_\_\_

**Jury Demand Endorsed Hereon**

**COMPLAINT**

**COMES NOW**, Plaintiff Ernestine Williams, as the Administrator of the Estate of Skylar Williams, deceased, through undersigned counsel, and hereby files a complaint for wrongful death and the injury claims that survive such death, as follows:

**FIRST CLAIM FOR RELIEF OF PLAINTIFF ERNESTINE WILLIAMS AS  
ADMINISTRATOR OF ESTATE OF SKYLAR WILLIAMS, DECEASED,  
AGAINST ALL DEFENDANTS FOR SURVIVORSHIP**

1. Plaintiff Ernestine Williams, who was appointed as Administrator of the Estate of her daughter Skylar Williams, deceased, by the Richland County Probate Court on October 6, 2020 Case Number 20201427, brings this action for the injuries and damages to Skylar Williams, prior to her death and for the benefit of the Estate of Skylar Williams, deceased. A copy of the Letter of Authority is attached hereto as Exhibit A.

2. At all times relevant herein, Defendant CLERAC, LLC d/b/a Enterprise Rent-A-Car (hereinafter referred to collectively as “Enterprise Rent-A-Car” or “Enterprise”), transacts business, in combination with Defendant EAN Holdings LLC or by itself, throughout the State of Ohio and in Richland County, Ohio at a store it owns and operates at 1512 W 4<sup>th</sup> Street, Mansfield, Ohio 44906 and said Defendant conducted activity that gave rise to the claims in this action in Richland County, Ohio. Defendant Enterprise Holdings Inc., upon information and belief, is a company that controls or affiliates with CLERAC LLC. Accordingly, venue is proper for this action in Richland County, Ohio, pursuant to Ohio R. Civ. P. 3 (C) (3).

3. At all times relevant herein, Defendant EAN Holdings, LLC d/b/a Enterprise Rent-A-Car (hereinafter referred to collectively as “Enterprise Rent-A-Car” or “Enterprise”), transacts business, in combination with Defendant CLERAC, LLC or by itself, throughout the State of Ohio and in Richland County, Ohio at a store it owns and operates at 1512 W 4<sup>th</sup> Street, Mansfield, Ohio

44906. Defendant Enterprise Holdings Inc., upon information and belief, is a company that controls or affiliates with EAN Holdings LLC. Accordingly, venue is proper for this action in Richland County, Ohio, pursuant to Ohio R. Civ. P. 3 (C) (3).

4. At all times relevant herein, Defendants John Doe (s) and Jane Roe (s), names and address(es) unknown, are or were employees, agents or representative(s) of Defendant Enterprise Rent-A-Car that engaged in negligence as to training, supervision, entrusted and retention at the store located at 1512 W. 4<sup>th</sup> Street, Mansfield, Ohio 44906; and the John Doe and Jane Roe Corporations, Limited Liability Companies, Businesses or Other Entities, by and through employees, agents or representatives, acted negligently in this action by and through employees, agents, and representatives which are unknown to Plaintiff. Plaintiff has not been able to identify the names (s) and address(es) of Defendants John and Jane Doe individuals, corporations, limited liability companies, businesses and other entities, through the exercise of reasonable diligence. John Doe and Jane Roe are residents of the State of Ohio and are subject to the jurisdiction of this Court, or in the alternative, one or more of the them are foreign entities doing business in the State of Ohio.

5. On the morning of February 11, 2019, Ty'Rell Pounds used a rental car provided to him by Defendant Enterprise Rent-A-Car's to abduct and kill Skylar Williams from The Ohio State University campus in Mansfield ("OSU") where she was a student. Ty'Rell Pounds was killed in the ensuing shootout with police.

6. Several months before her untimely death, Skylar and her sister had informed Defendant Enterprise-Rent-A-Car that Ty'Rell Pounds had been stalking Skylar by rental car while he was on the job.

7. At the time Skylar and her sister reported the stalking to Defendant Enterprise, the supervisor of the store let them know that the store had previously received complaints about Ty'Rell's use of rental cars.

8. About a month before she was abducted and killed, an officer at OSU's campus informed Defendant Enterprise Rent-A-Car once more that Ty'Rell was stalking Skylar using company rental cars.

9. Defendant Enterprise's store manager confirmed that Ty'Rell, acting in the scope and course of his employment, was picking up customers on the day the OSU officer contacted the store.

10. Ty'Rell Pounds continued to have access to Defendant Enterprise's vehicles after at least three people had reported the stalking by rental car.

11. Decedent Skylar was abducted around 11:30 am on February 11, 2019 and held hostage for almost five hours before being shot to death in her chest while confined to the passenger seat of a vehicle owned by Defendant Enterprise Rent-A-Car. Ty'Rell Pounds was found to have had on a bulletproof vest in the rental car where Skylar died.

12. After abducting Skylar and before killing her, Ty'Rell Pounds returned to Defendant Enterprise Rent-A-Car's store location to pick up his car.

13. Ty'Rell Pounds was an employee of Defendant Enterprise at all times complained of herein.

14. Skylar passed away leaving a son who is now three-years old.

15. Defendant Enterprise Rent-A-Car had a duty to take appropriate measures once it learned of the dangerous propensity of its employee.

16. Defendant Enterprise Rent-A-Car knew or should have known about the dangerous propensity of its employee.

17. Any failure to learn about the dangerous propensity of its employee was due to Defendant Enterprise Rent-A-Car's negligent training of the store managers, John Doe and/or Jane Roe at the Mansfield location.

18. Defendant Enterprise Rent-A-Car was aware of Ty'Rell Pound's incompetence and/or dangerous propensity and negligently entrusted, retained, or supervised such employee.

19. Defendant Enterprise Rent-A-Car's negligent entrustment, retention, or supervision of its employee actually and proximately caused Skylar to endure mental anguish and experience terrifying pain and suffering.

20. Skylar's death was directly and proximately caused by Defendant Enterprise Rent-A-Car's negligent entrustment of their company vehicles to Ty'Rell Pounds, its employee.

21. Skylar's death was directly and proximately caused by Defendant Enterprise Rent-A-Car's negligent supervision of Ty'Rell Pounds, its employee.

22. Skylar's death was directly and proximately caused by Defendant Enterprise Rent-A-Car's negligent retention of Ty'Rell Pounds, its employee.

23. Defendant Enterprise Rent-A-Car derived a benefit from the activities of its employee, Ty'Rell Pounds, while he stalked Skylar Williams by rental car.

24. Defendant Enterprise Rent-A-Car had actual or constructive knowledge of Ty'Rell Pounds' stalking and intimidation by rental car and ratified such stalking and intimidation of Skylar Williams.

25. As a direct and proximate result of the conduct of the Defendants, Skylar Williams, the deceased, experienced much fear, intimidation, pain, suffering, and mental anguish until the time of her wrongful death.

**SECOND CLAIM OF RELIEF OF PLAINTIFF ERNESTINE WILLIAMS,  
ADMINISTRATOR OF THE ESTATE OF SKYLAR WILLIAMS, DECEASED,  
AGAINST DEFENDANTS FOR WRONGFUL DEATH**

26. Plaintiff Ernestine Williams, as Administrator of the Estate of Skylar Williams, deceased, incorporates all of the allegations contained in paragraphs one (1) through twenty-five (25) as if they were fully rewritten herein.

27. Plaintiff Ernestine Williams is the natural mother of, and administrator of the Estate of Skylar Williams, deceased. She brings this action pursuant to Ohio Revised Code § 2125.01 and § 2125.02 for the exclusive benefit of the next of kin of Skylar Williams, deceased.

28. As further direct and proximate result of the conduct of Defendants, the next-of-kin of the decedent have suffered pecuniary loss and non-pecuniary loss, including but not limited, the loss of support, services, consortium, care, attention, protection, advice, guidance, counsel, instruction, and education by decedent for her child and next-of-kin and further loss of prospective inheritance and have suffered mental anguish.

29. As further direct and proximate result of the conduct of the Defendants, the next-of-kin of the decedent incurred reasonable burial and funeral expenses.

**WHEREFORE**, Plaintiff Ernestine Williams as the natural mother of Skylar Williams, deceased, and as Administrator of the Estate of Skylar Williams, for exclusive benefit of the next-of-kin, demands judgment against the Defendants, jointly and severally, in an amount greater than Twenty-Five Thousand Dollars (\$25,000.00), plus interest, the costs of this action and all other relief that this Court deems just and equitable.

Respectfully Submitted,

**REYNOLDS LAW GROUP, LLC**



Isaac Tekie

Georgia Bar No. 558190

The Lenox Towers

3390 Peachtree Road, N.E., Ste. 1100

Atlanta, Ga. 30326

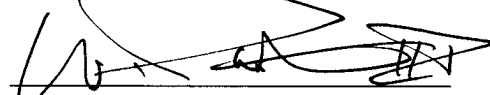
Telephone: 404.420.1030

Facsimile: 888.677.1453

E-mail: itekie@thomasreynoldslaw.com

and

**THE PATMON LAW FIRM LLC**



William W. Patmon III, (0062204)

The Patmon Law Firm LLC

4200 Regent Street Suite 200

Columbus, OH 43219

Telephone: 614.944.5786

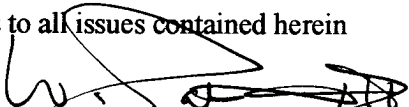
Facsimile: 614.448.4393

E-mail: wpatmon@patmonlaw.com

*Attorneys for Plaintiff*

**JURY DEMAND**

Plaintiff hereby demands trial by jury as to all issues contained herein



William W. Patmon III (0062204)

## EXHIBIT A

FILED

OCT 06 2020

PROBATE COURT OF RICHLAND

COUNTY, OHIO

ESTATE OF SKYLAR NICHOLE WILLIAMSRichland County Court  
of Common Pleas  
Probate Division  
DECEASEDCASE NO. 20201427

## ENTRY APPOINTING FIDUCIARY; LETTERS OF AUTHORITY

[For Executors and all Administrators]

Name and Title of Fiduciary ERNESTINE R. WILLIAMS, Administrator

On hearing in open Court the application of the above fiduciary for authority to administer decedent's estate, the Court finds that:

Decedent died [check one of the following] ☐ testate - ☒ intestate - on February 11, 2019  
domiciled in Richland County, Ohio[Check one of the following] ☐ Bond is dispensed with by the Will - ☒ Bond is dispensed with by law - ☐ Applicant has executed and filed an appropriate bond, which is approved by the Court; and

Applicant is a suitable and competent person to execute the trust.

The Court therefore appoints applicant as such fiduciary, with the power conferred by law to fully administer decedent's estate. This entry of appointment constitutes the fiduciary's letters of authority.

Date

Oct. 6, 2020PROBATE JUDGE Philip Alan B. Mayer

## CERTIFICATE OF APPOINTMENT AND INCUMBENCY

The above document is a true copy of the original kept by me as custodian of the records of this Court. It constitutes the appointment and letters of authority of the named fiduciary, who is qualified and acting in such capacity.

PHILIP ALAN B. MAYER

Probate Judge/Clerk

[Seal]

by Traci A. MergelDate 10-6-20



**EXHIBIT A**

**9**

**SUMMONS**

Richland County Common Pleas Court of Ohio

ERNESTINE R WILLIAMS INDIVIDUALLY

CASE: 2021 CV 0061

VS

CLERAC LLC

CLERAC LLC  
DBA ENTERPRISE RENT A CAR  
C/O S/A CT CORPORATION SYSTEM  
4400 EASTON COMMONS WAY SUITE 125  
COLUMBUS, OH 43219

You have been named Defendant (s) in a complaint filed in Richland County Court of Common Pleas, 50 Park Ave East, Mansfield, Ohio by

ERNESTINE R WILLIAMS INDIVIDUALLY  
AS ADMINISTRATOR OF THE ESTATE OF  
MANSFIELD, OH 44905

Plaintiff (s). A copy of the Complaint is attached hereto. The name and address of the Plaintiff's Attorney is,  
WILLIAM W PATMON III  
THE PATMON LAW FIRM LLC  
4200 REGENT STREET SUITE 200  
COLUMBUS, OH 43219

You are hereby summoned and required to serve upon the Court, your answer to the complaint within **28 days** after service of this summons on you, exclusive of the day of service. You must also serve a copy of the answer upon the Plaintiff's Attorney, or upon the Plaintiff, if he/she has no Attorney of record within 3 days after filing the Answer with the Court.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

February 5, 2021

LINDA H FRARY  
CLERK, COURT OF COMMON PLEAS

By J. Hittinger  
Deputy Clerk

\*\*\*\*\*SUMMONS SENT BY REGULAR MAIL AS INSTRUCTED, ON DATE ABOVE. PER CIV. R. 4.6(D), YOUR ANSWER DATE IS:

**SHERIFF'S RETURN**

Service and Return: \$ \_\_\_\_\_  
Mileage \$ \_\_\_\_\_  
TOTAL \$ \_\_\_\_\_

How Served: (Mail / Person)

When Served: \_\_\_\_\_

\_\_\_\_\_  
Sheriff

**EXHIBIT A****10****SUMMONS**

Richland County Common Pleas Court of Ohio

ERNESTINE R WILLIAMS INDIVIDUALLY

CASE: 2021 CV 0061

VS

CLERAC LLC

EAN HOLDINGS LLC  
 DBA ENTERPRISE RENT A CAR  
 C/O S/A CT CORPORATION SYSTEM  
 4400 EASTON COMMONS WAY SUITE 125  
 COLUMBUS, OH 43219

You have been named Defendant (s) in a complaint filed in Richland County Court of Common Pleas, 50 Park Ave East, Mansfield, Ohio by

ERNESTINE R WILLIAMS INDIVIDUALLY  
 AS ADMINISTRATOR OF THE ESTATE OF  
 MANSFIELD, OH 44905

Plaintiff (s). A copy of the Complaint is attached hereto. The name and address of the Plaintiff's Attorney is,  
 WILLIAM W PATMON III  
 THE PATMON LAW FIRM LLC  
 4200 REGENT STREET SUITE 200  
 COLUMBUS, OH 43219

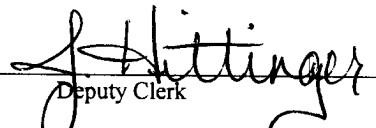
You are hereby summoned and required to serve upon the Court, your answer to the complaint within **28 days** after service of this summons on you, exclusive of the day of service. You must also serve a copy of the answer upon the Plaintiff's Attorney, or upon the Plaintiff, if he/she has no Attorney of record within 3 days after filing the Answer with the Court.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

February 5, 2021

LINDA H FRARY  
 CLERK, COURT OF COMMON PLEAS

By

  
 Deputy Clerk

\*\*\*\*\*SUMMONS SENT BY REGULAR MAIL AS INSTRUCTED, ON DATE ABOVE. PER CIV. R. 4.6(D), YOUR ANSWER DATE IS:

## SHERIFF'S RETURN

Service and Return:	\$ _____
Mileage	\$ _____
TOTAL	\$ _____

How Served: (Mail / Person)

When Served: \_\_\_\_\_

 \_\_\_\_\_  
 Sheriff

**EXHIBIT A****11****SUMMONS**

Richland County Common Pleas Court of Ohio

ERNESTINE R WILLIAMS INDIVIDUALLY

CASE: 2021 CV 0061

VS

CLERAC LLC

ENTERPRISE HOLDINGS INC  
 GENERAL MANAGER OR COUNSEL  
 600 CORPORATE PARK DRIVE  
 ST LOUIS, MO 63105

You have been named Defendant (s) in a complaint filed in Richland County Court of Common Pleas, 50 Park Ave East, Mansfield, Ohio by

ERNESTINE R WILLIAMS INDIVIDUALLY  
 AS ADMINISTRATOR OF THE ESTATE OF  
 MANSFIELD, OH 44905

Plaintiff (s). A copy of the Complaint is attached hereto. The name and address of the Plaintiff's Attorney is,  
 WILLIAM W PATMON III  
 THE PATMON LAW FIRM LLC  
 4200 REGENT STREET SUITE 200  
 COLUMBUS, OH 43219

You are hereby summoned and required to serve upon the Court, your answer to the complaint within **28 days** after service of this summons on you, exclusive of the day of service. You must also serve a copy of the answer upon the Plaintiff's Attorney, or upon the Plaintiff, if he/she has no Attorney of record within 3 days after filing the Answer with the Court.

If you fail to appear and defend, judgment by default will be rendered against you for the relief demanded in the complaint.

February 5, 2021

LINDA H FRARY  
 CLERK, COURT OF COMMON PLEAS

By

  
 Deputy Clerk

\*\*\*\*\*SUMMONS SENT BY REGULAR MAIL AS INSTRUCTED, ON DATE ABOVE. PER CIV. R. 4.6(D), YOUR ANSWER DATE IS:


## SHERIFF'S RETURN

Service and Return: \$ \_\_\_\_\_  
 Mileage \$ \_\_\_\_\_  
 TOTAL \$ \_\_\_\_\_

How Served: (Mail / Person)

When Served: \_\_\_\_\_

\_\_\_\_\_  
Sheriff

Return Receipt (Form 3811) Barcode		COMPLETE THIS SECTION ON DELIVERY	
 9590 9266 9904 2158 5634 28		<b>EXHIBIT A</b> X <i>[Signature]</i>	
		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Addressee Addressed to:		B. Received by (Printed Name) <b>Daniel D. Kelley</b>	C. Date of Delivery
CLERK OF COURTS 701 FEB 22 A 11:48 CLERK OF COURTS		D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No	
		E. Service type: <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery	
2. Certified Mail (Form 3800) Article Number 9414 7266 9904 2158 5634 25		Reference Information 9414 7266 9904 2158 5634 25 CLERK OF COURTS	

Return Receipt (Form 3811) Barcode  
Case: 1:21-cv-00572-DAP Doc #: 1-1 Filed: 03/11/21 13 of 16. PageID #: 19

**EXHIBIT**

9570 9266 9904 2158 5634 35

1. Article Addressed to:

EAN HOLDINGS LLC  
DBA ENTERPRISE RENT A CAR  
C/O S/A CT CORPORATION  
4400 EASTON COMMONS WAY SUITE  
COLUMBUS, OH 43219

2021 CV 0067

2. Certified Mail (Form 3800) Article Number

9414 7266 9904 2158 5634 32

COMPLETE THIS SECTION ON DELIVERY

☒ Agent  
☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type:

☒ Certified Mail  
☐ Certified Mail Restricted Delivery

Reference Information

9414 7266 9904 2158 5634 32

CLERK OF COURTS

PS Form 3811 Facsimile, July 2015 Domestic Return Receipt

**IN THE COMMON PLEAS COURT  
RICHLAND COUNTY, OHIO**

Case No. 2021 CV 0061

**ERNESTINE R WILLIAMS  
INDIVIDUALLY**

**CLERAC LLC**

**Plaintiff**

**Defendant**

**SEND TO:**

File Copy  
2021 CV 0061

WILLIAM W PATMON III  
THE PATMON LAW FIRM LLC  
4200 REGENT STREET SUITE 200  
COLUMBUS, OH 43219  
(614)-944-5786

(--

RICHLAND COUNTY  
CLERK OF COURTS  
FILED  
2021 FEB 11 P 1:52  
LINDA H. FRARY  
CLERK OF COURTS

**SCHEDULING ORDER**

An INITIAL SCHEDULING CONFERENCE in the above case is ORDERED:

Date: 05/03/2021

Time: 10:30 am

Place: 50 PARK AVE. EAST  
MANSFIELD, OH 44902

Courtroom: COURTROOM 3  
Phone 419-774-5570

**NOTICE: YOU STILL MUST ANSWER THE COMPLAINT, WITHIN 28 DAYS AFTER IT WAS SERVED ON YOU, TO AVOID DEFAULT JUDGMENT AGAINST YOU.**

This scheduling conference will be conducted by the **MAGISTRATE ANDREA J CLARK** and may be held by telephone upon the condition that opposing counsel are notified and given the opportunity to appear by phone as well. The requesting party shall conference in all parties appearing by phone and then conference in the Court. The Court does not require notice of the intent to appear by phone. The scheduling conference will identify issues for trial and establish a schedule for disposition of the case. Counsel (not secretaries or paralegals) shall be prepared to discuss issues in the case, discovery yet to be completed and the time needed for discovery, pending or anticipated motions, settlement proposals, time required for trial and trial dates. Attorneys will bring their calendars to the conference to facilitate scheduling.

IF THERE ARE ANY DEFENDANTS WHO HAVE NOT YET ENTERED AN APPEARANCE, PLAINTIFF'S COUNSEL SHALL ASSURE THEY ARE SERVED WITH A COPY OF THIS SCHEDULING ORDER WHEN THEY APPEAR.  
SO ORDERED.

**JUDGE PHILLIP S NAUMOFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served according to local rules and sent by ☐ Regular Mail, ☐ Hand-delivered to parties, ☐ Placed in counsel's box in Clerk's Office on February 11, 2021, to the following:

cc:

CLERAC LLC  
EAN HOLDINGS LLC  
ENTERPRISE HOLDINGS INC

ISAAC TEKIE  
WILLIAM W PATMON III  
WENDY MILLS

2021 CV 0061 WILLIAMS INDIVIDUALLY, ERNESTINE R VS CLERAC LLC PSN

Case Type:  
 CIVIL  
 Case Status:  
 OPEN  
 File Date  
 02/04/2021  
 DCM Track:  
 .  
 Action:  
 OTHER TORTS  
 Status Date:  
 02/04/2021  
 Case Judge:  
 NAUMOFF, JUDGE PHILLIP S  
 Next Event:  
 05/03/2021

[All Information](#) | 
 [Party](#) | 
 [Docket](#) | 
 [Event](#) | 
 [Disposition](#) | 
 [Financial](#) | 
 [Service Records](#)

## Docket Information

Date	Docket Text	Amount Owed
02/04/2021	DEPOSIT Receipt: 404015 Date: 02/05/2021	\$133.00
02/04/2021	HOUSE BILL FEE-CIVIL Receipt: 404015 Date: 02/05/2021	\$26.00
02/04/2021	CLERK'S COMPUTER FEE-GEN DIV Receipt: 404015 Date: 02/05/2021	\$20.00
02/04/2021	COURT'S COMPUTER FEE Receipt: 404015 Date: 02/05/2021	\$6.00
02/04/2021	CLERKS FEES Receipt: 404015 Date: 02/05/2021	\$25.00
02/04/2021	SPECIAL PROJECT FEE-CIVIL Receipt: 404015 Date: 02/05/2021	\$70.00
02/04/2021	MEDIATION AND PROJECTS FUND Receipt: 404015 Date: 02/05/2021	\$20.00
02/04/2021	OTHER TORTS	
02/04/2021	DEPOSIT FOR JURY DEMAND Attorney: PATMON III, WILLIAM W (62204) Receipt: 404015 Date: 02/05/2021	\$400.00
02/04/2021	COMPLAINT W/ JURY DEMAND FILED Attorney: PATMON III, WILLIAM W (62204) SCANNED 2/5/2021 JAH	\$8.00
02/05/2021	SUMMONS CERTIFIED MAIL - SCANNED 2/5/2021 JAH	\$2.00
02/05/2021	Issue Date: 02/05/2021 Service: SUMMONS CERTIFIED MAIL - Method: CERTIFIED MAIL Cost Per: \$10.00  CLERAC LLC DBA ENTERPRISE RENT A CAR C/O S/A CT CORPORATION SYSTEM 4400 EASTON COMMONS WAY SUITE 125 COLUMBUS, OH 43219 Tracking No: 9414726699042158563425  EAN HOLDINGS LLC DBA ENTERPRISE RENT A CAR C/O S/A CT CORPORATION SYSTEM 4400 EASTON COMMONS WAY SUITE 125 COLUMBUS, OH 43219 Tracking No: 9414726699042158563432  ENTERPRISE HOLDINGS INC GENERAL MANAGER OR COUNSEL 600 CORPORATE PARK DRIVE ST LOUIS, MO 63105 Tracking No: 9414726699042158563449	\$30.00
02/11/2021	HEARING SCHEDULED: Event: INITIAL SCHEDULING CONFERENCE Date: 05/03/2021 Time: 10:30 am Judge: CLARK, ANDREA J Location: COURTROOM 3	
02/11/2021	HEARING SCHEDULED/ORDER FILED SCANNED 02/12/21 BPD	\$2.00
02/12/2021	POSTAGE FEE ISAAC TEKIE WILLIAM PATMON III CLERAC LLC ENTERPRISE HOLDINGS INC EAN HOLDING LLC	\$7.50
02/22/2021	SUCCESSFUL SERVICE Method : CERTIFIED MAIL Issued : 02/05/2021 Service : SUMMONS CERTIFIED MAIL - Served : 02/17/2021 Return : 02/22/2021 on : CLERAC LLC Signed By : DANIEL D KELLEY Reason : SUCCESSFUL SERVICE Comment : SCANNED 02/23/21 BPD Tracking #: 9414726699042158563425	
02/22/2021	SUCCESSFUL SERVICE Method : CERTIFIED MAIL Issued : 02/05/2021 Service : SUMMONS CERTIFIED MAIL - Served : 02/17/2021 Return : 02/22/2021 on : EAN HOLDINGS LLC Signed By : DANIEL D KELLEY Reason : SUCCESSFUL SERVICE Comment : SCANNED 02/23/21 BPD Tracking #: 9414726699042158563432	

**EXHIBIT A**

**16**